

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America

v.

(1) David Wright a/k/a Dawud Sharif Wright,
a/k/a Dawud Sharif Abdul Khaliq, and
(2) Nicholas Rovinski a/k/a Nuh Amriki,
a/k/a Nuh Andalusi

Case No.

15-1085-DLC

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 2015-June 2, 2015 in the county of Middlesex in the
 District of Massachusetts, the defendant(s) violated:

Code Section

18 U.S.C. § 2339B

Offense Description

Wright and Rovinski did knowingly conspire with each other, with Ussamah Abdullah Rahim, and with unknown conspirators to provide material support and resources (as that term is defined in 18 U.S.C. § 2339A(b)(1)), to wit, personnel and services to a foreign terrorist organization, namely the Islamic State of Iraq and the Levant, ISIL, which has been designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, in violation of 18 U.S.C. § 2339B.

This criminal complaint is based on these facts:

See Affidavit of Special Agent J. Joseph Galietta, Federal Bureau of Investigation

☒ Continued on the attached sheet.
Complainant's signature

Special Agent J. Joseph Galietta, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/12/2015
*Judge's signature*City and state: Boston, MA

Magistrate Judge Donald L. Cabell

Printed name and title